

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN

United States of America,

Plaintiff,

v.

D-1 Christopher Johnson,

Defendant.

Case:2:19-cr-20638

Judge: Roberts, Victoria A.

MJ: Grand, David R.

Filed: 09-24-2019 At 04:04 PM

INDI USA V. SEALED MATTER (DA)

Violations:

18 U.S.C. § 1343

18 U.S.C. § 1028A(a)(1)

**INDICTMENT**

THE GRAND JURY CHARGES:

**COUNTS 1-3**

**18 U.S.C. § 1343 -Wire Fraud**

**D-1 Christopher Johnson**

1. Beginning on a date unknown, but from at least on or about April 2016, and continuing until at least on or about June 2016, in the Eastern District of Michigan, Southern Division, and elsewhere, CHRISTOPHER JOHNSON devised and intended to devise a scheme to defraud, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises.
2. It was part of the scheme that JOHNSON obtained credit card information relating to accounts in the names of other persons. JOHNSON obtained this

information without the authorization of those other persons.

3. It was also a part of the scheme that JOHNSON used credit card information relating to accounts in the names of other persons to obtain things of value and to attempt to obtain things of value. JOHNSON used, and attempted to use, this credit card information without the authorization of the true account holders. In doing so, JOHNSON fraudulently misrepresented that he had authority to engage in the transactions that he was conducting and attempting to conduct.
4. It was also a part of the scheme that JOHNSON misrepresented and concealed his true identity while using the credit card information relating to accounts in the names of other persons.

#### **Use of the Wires**

5. On or about the dates specified as to each count below, in the Eastern District of Michigan and elsewhere, JOHNSON, for the purpose of executing the scheme described above, caused to be transmitted by means of wire communication in interstate commerce, the signals and sounds described below for each count, each transmission constituting a separate count:

COUNT	DATE	DESCRIPTION
1	5/15/16	\$100 Payment to Baymont Inn & Suites using Credit Card Account #0248
2	5/23/16	\$84.67 Payment to Home Depot using Credit Card Account #3268
3	5/23/16	\$92.99 Payment to Home Depot using Credit Card Account #7598

All in violation of Title 18, United States Code, Section 1343.

**COUNT 4-6**

**18 U.S.C. § 1028A(a)(1) – Aggravated Identity Theft**

D-1 Christopher Johnson

On or about the individual dates set forth below, within the Eastern District of Michigan, defendant **CHRISTOPHER JOHNSON** did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person, to wit, credit card account numbers set forth below, during and in relation to the felony offenses set forth below, knowing that the means of identification belonged to another actual person:

Count	Date	Account #	Felony Offense
4	5/15/16	0248	Wire Fraud (18 U.S.C. § 1343) Count 1
5	5/23/16	3268	Wire Fraud (18 U.S.C. § 1343) Count 2
6	5/23/16	7598	Wire Fraud (18 U.S.C. § 1343) Count 3

All in violation of Title 18, United States Code, Section 1028A(a)(1).

**FORFEITURE ALLEGATIONS**  
**18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461**

As a result of the violations of Title 18, United States Code, Sections 1343 (wire fraud) set forth in Counts 1 through 3 of this indictment, upon conviction Defendant shall forfeit to the United States any property, real or personal, which constitutes or is derived from proceeds traceable to the violation, pursuant to 18 U.S.C. § 981(a)(1)(C), as incorporated by 28 U.S.C. § 2461.

Such property includes, but is not limited to, a money judgment in an amount to be determined in United States currency, and all traceable interest and proceeds for which the defendants are jointly and severally liable. Such sum in aggregate is equal to property representing the proceeds of the aforementioned offenses, or is traceable to such property, in violation of 18 U.S.C. §1343..

Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b), if the property described above as being subject to forfeiture, as a result of any act or omission of the defendant(s):

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third party;
- (3) has been placed beyond the jurisdiction of the Court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property that cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek to forfeit any other property of the defendants up to the listed value.

THIS IS A TRUE BILL

/s/Grand Jury Foreperson

GRAND JURY FOREPERSON

MATTHEW SCHNEIDER  
United States Attorney

/s/John K. Neal

JOHN K. NEAL  
Chief, White Collar Crimes

/s/Andrew J. Yahkind

ANDREW J. YAHKIND  
Assistant United States Attorney

Dated: September 24, 2019

United States District Court  
Eastern District of Michigan

Criminal Case Cover Sheet

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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all

Companion Case Information	Companion Case
This may be a companion case based on LCrR 57.10(b)(4) <sup>1</sup> :	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: <i>AY</i>

Case Title: USA v. Christopher JohnsonCounty where offense occurred: Oakland and WayneOffense Type: FelonyIndictment -- no prior complaint

ORIGINAL

**Superseding Case Information**

Superseding to Case No: \_\_\_\_\_ Judge: \_\_\_\_\_

Reason: \_\_\_\_\_

Defendant NameChargesPrior Complaint (if applicable)

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case

September 24, 2019  
Date
  
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 Assistant United States Attorney  
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 (313) 226-9565

<sup>1</sup> Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.